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May 15, 2002

Sarah T. Branum
Environmental Specialist -- KEC-4
Bonneville Power Administration
PO Box 3621
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Dear Ms. Branum:

Thank you for considering the following comments regarding the Draft NEPA/SEPA EIS for the Maiden Wind Farm (Benton County, WA; March 2002).

The project's location skirting the southwest boundary of the Hanford Reach National Monument's Fitzner Eberhardt Arid Lands Ecology Reserve gives us great concern.

The location of 549 wind turbines arranged in up to seven succeeding rows aligned with the prevailing winds on the very doorstep of the most valuable shrubb-steppe bird habitat in Eastern Washington possess an unacceptable risk to bird species, which inhabit and pass through the Hanford Reach National Monument.

The Fixed Point (Raptor & Large Bird) Surveys which included 232 30 minute point count surveys at eight fixed stations between April 20 and October 28, 2001 may seem adequate at first glance. If the project were not located next to one of Washington's Important Bird Areas or habitat of the quality and uniqueness of the Monument this survey would probably be considered adequate, but it is far from adequate for this site. The surveys also did not include the late fall and winter months which are very active periods for raptors in this area. The surveys were also conducted during one of the driest summers in this area's recorded history, which could dramatically reduce the number of species and birds observed over the norm. Was the recent Hanford wildfire considered in terms of indicating abnormal bird occurrence during the survey period? We do not believe the surveys accurately measure the importance of the project area to birds.

We recommend that additional surveys be conducted during all periods of the year and in much greater depth. The report should also indicate time of day the surveys were conducted. The surveys should also include how birds move to and from the Monument,

utilizing radio tracking and other technologies rather than relying solely on point count surveys.

The large number of proposed electrical generating projects, which have been cancelled in recent months, cast doubts on the need for the project and certainly is an indicator that the project's power is not critical at this time.

The impacts of the project on bird life in the area should be fully mitigated. If the project severely impacts the birds which inhabit the 190,000 acre Hanford Reach National Monument how do you mitigate this? Where are we to find another Hanford Reach National Monument to replace the one the project severely damages? It seems highly unlikely that you could ever fully mitigate the damage and therefore the project should not proceed until the mitigation question is fully answered.

Thank you for the opportunity to comment on the draft EIS.

Sincerely,

Richard J. Leaumont
Conservation Committee Chairperson